

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: INSTANT BRANDS ACQUISITION HOLDINGS INC., et al., <p style="text-align: center;">Debtors.¹ </p>	§ § § § § § §	Chapter 11 Case No. 23-90716 (DRJ) Jointly Administered
--	---------------------------------	--

NOTICE OF VIRTUAL HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that, on June 12, 2023 (the “**Petition Date**”), Instant Brands Acquisition Holdings Inc. and certain of its affiliates (collectively, the “**Debtors**”), each of which is a debtor and debtor in possession in the above-captioned chapter 11 cases, filed their voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, in accordance with sections A and I of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “**Complex Case Procedures**”), a virtual hearing (the “**First Day Hearing**”) is set for **June 13, 2023 at 3:00 p.m.** (prevailing Central Time), before the Honorable David R. Jones to consider the following:

Declarations

1. **First Day Declaration.** Declaration of Adam Hollerbach as Chief Restructuring Officer of the Debtors in Support of Debtors’ Chapter 11 Proceedings and First Day Pleadings.
2. **DIP Declaration.** Declaration of Ronen Bojmel in Support of the Debtors’ Emergency Motion for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362,,363, 364, 503, 506, 507, and 552, (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Post-petition Financing and (B) Use Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Providing Adequate Protection to

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or registration numbers in the applicable jurisdictions, are as follows: Instant Brands (Texas) Inc. (2526); Instant Brands Acquisition Holdings Inc. (9089); Instant Brands Acquisition Intermediate Holdings Inc. (3303); Instant Brands Holdings Inc. (3318); URS-1 (Charleroi) LLC (7347); Instant Brands LLC (0566); URS-2 (Corning) LLC (8085); Corelle Brands (Latin America) LLC (8862); EKCO Group, LLC (7167); EKCO Housewares, Inc. (0216); EKCO Manufacturing of Ohio, Inc. (7300); Corelle Brands (Canada) Inc. (5817); Instant Brands (Canada) Holding Inc. (4481); Instant Brands Inc. (8272); and Corelle Brands (GHC) LLC (9722). The address of the debtors’ corporate headquarters is 3025 Highland Parkway, Suite 700, Downers Grove, IL 60515.

Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief.

First Day Motions

3. **Joint Administration Motion.** Debtors' Emergency Motion For Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief.
4. **DIP/Cash Collateral Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 506, 507, and 552 (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Post-Petition Financing, and (B) Use Cash Collateral, (II) Granting Liens And Superpriority Administrative Expense Claims, (III) Providing Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief.
5. **DIP Sealing Motion.** Debtors' Emergency Motion For Entry of an Order (I) Authorizing the Debtors to File the Fee Letter Between the Debtors and the Agent Under Seal and (II) Granting Related Relief.
6. **Cash Management Motion.** Debtors' Emergency Motion For Entry of Interim and Final Orders (I) Authorizing (A) Debtors To Continue To Maintain Existing Cash Management System, Bank Accounts, and Business Forms, (B) Debtors To Open and Close Bank Accounts, and (C) Financial Institutions To Administer the Bank Accounts and Honor and Process Related Checks and Transfers, (II) Waiving Deposit and Investment Requirements, (III) Allowing Intercompany Transactions and Affording Administrative Expense Priority to Post-Petition Intercompany Claims, and (IV) Authorizing Debtors To Continue Utilizing the C2FO Platform.
7. **Wages Motion.** Debtors' Emergency Motion For Entry of an Order Authorizing (I) Debtors To (A) Pay Prepetition Employee Obligations and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Current and Former Employees To Proceed with Outstanding Workers' Compensation Claims, and (III) Financial Institutions To Honor and Process Related Checks and Transfers.
8. **Vendors Motion.** Debtors' Emergency Motion For Entry of Interim and Final Orders (I) Authorizing Debtors To Pay Prepetition Critical Vendor Claims, Foreign Vendor Claims, and 503(b)(9) Claims in the Ordinary Course of Business, (II) Granting Administrative Expense Status to Debtors' Undisputed Obligations to Vendors Arising From the Post-Petition Delivery of Goods Ordered Prepetition and Authorizing Debtors To Pay Those Obligations in the Ordinary Course of Business, (III) Authorizing Debtors To Return Goods, (IV) Authorizing Debtors To Pay Certain Prepetition Claims of Lien Claimants, and (V) Authorizing Financial Institutions To Honor and Process Related Checks and Transfers.

9. **Customer Programs Motion.** Debtors' Emergency Motion For Entry of Interim and Final Orders Authorizing (I) Debtors To Honor Prepetition Obligations to Customers and Otherwise Continue Customer Practices and (II) Financial Institutions To Honor and Process Related Checks and Transfers.
10. **Tax Attributes Motion.** Debtors' Emergency Motion For Entry of Interim and Final Orders Establishing Notification and Hearing Procedures For, and Approving Restrictions on, Certain Transfers of and Declarations of Worthlessness with Respect to Equity Interests in the Debtors' Estates.
11. **Utilities Motion.** Debtors' Emergency Motion For Entry of an Order (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance.
12. **Insurance Motion.** Debtors' Emergency Motion For Entry of an Order Authorizing (I) Debtors To (A) Continue and Renew their Liability, Property, Casualty, Surety Bond, and Other Insurance Programs and Honor All Obligations in Respect Thereof, (B) Honor and Renew the Terms of the Premium Financing Agreement and Pay the Financing Agreement Payments Thereunder and (C) Enter into New Premium Financing Agreements in the Ordinary Course of Business, and (II) Financial Institutions To Honor and Process Related Checks and Transfers.
13. **Taxes Motion.** Debtors' Emergency Motion For Entry of an Order Authorizing (I) Debtors To Pay Certain Prepetition Taxes, Governmental Assessments, and Fees and (II) Financial Institutions To Honor and Process Related Checks and Transfers.
14. **Consolidated Creditors List/Redaction Motion.** Debtors' Emergency Motion For Entry of an Order (I) Authorizing Debtors To (A) File a Consolidated List of Debtors' 30 Largest Unsecured Creditors and (B) Redact Certain Personal Identifying Information and (II) Approving the Form and Manner of Notifying Creditors of the Commencement of the Chapter 11 Cases and Other Information.
15. **Schedules and SOFAs Extension Motion.** Debtors' Emergency Motion For Entry of an Order Extending Time To File (I) Schedules of Assets and Liabilities, (II) Schedules of Current Income and Expenditures, (III) Schedules of Executory Contracts and Unexpired Leases, (IV) Statements of Financial Affairs, and (V) Bankruptcy Rule 2015.3 Financial Reports.
16. **Automatic Stay Motion.** Debtors' Emergency Motion for Entry of a Standing Order Confirming the Statutory Protections of the Bankruptcy Code.
17. **Foreign Representative Motion.** Debtors' Emergency Motion For Entry of an Order (I) Authorizing Instant Brands Inc. To Act as Foreign Representative and (II) Granting Related Relief.

18. **Epiq's Retention Application.** Debtors' Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing, and Solicitation Agent.

PLEASE TAKE FURTHER NOTICE that the First Day Hearing will be conducted virtually only. No in-person attendance will be permitted. Audio communication will be by use of the Court's dial-in facility. You may access the facility at 832-917-1510. Once connected, you will be asked to enter the conference room number. Judge Jones's conference room number is 205691. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Jones's home page (<https://www.txs.uscourts.gov/content/united-states-bankruptcy-judge-david-r-jones>). The meeting code is "Judge Jones". Click the settings icon in the upper right corner and enter your name under the personal information setting.

PLEASE TAKE FURTHER NOTICE that hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your electronic appearance, click the "Electronic Appearance" link on Judge Jones's home page. Select the case name, complete the required fields, and click "Submit" to complete your appearance.

PLEASE TAKE FURTHER NOTICE that all documents filed in these chapter 11 cases are available free of charge by visiting <https://dm.epiq11.com/InstantBrands>. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court's website at <https://ecf.txs.uscourts.gov> in accordance with the procedures and fees set forth therein.

[Remainder of page intentionally left blank]

Dated: June 13, 2023
Houston, Texas

HAYNES AND BOONE, LLP

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr. (TX Bar No. 02016600)
Arsalan Muhammad (TX Bar No. 24074771)
David A. Trausch (TX Bar No. 24113513)
1221 McKinney Street, Suite 4000
Houston, Texas 77010
Tel.: (713) 547-2000
Email: charles.beckham@haynesboone.com
arsalan.muhammad@haynesboone.com
david.trausch@haynesboone.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)
Steven Z. Szanzer (admitted *pro hac vice*)
Joanna McDonald (admitted *pro hac vice*)
450 Lexington Avenue
New York, New York 10017
Tel.: (212) 450-4000
Email: brian.resnick@davispolk.com
steven.szanzer@davispolk.com
joanna.mcdonald@davispolk.com

Proposed Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that, on June 13, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.